REMARKS

The proposed amendment clarifies a feature of the claimed invention. Specifically, the proposed amendment makes clear that the claimed invention provides is a model of data elements *currently* stored within the cache. None of the cited prior art references discloses making a cache management decision based on a model of data elements that are *currently* stored in a cache. In fact, the prior art does not even disclose providing a model of data elements *currently* stored in a cache and, therefore, cannot make a cache management decision based on such a model.

Col. 6, lines 14-25 of Weinberger, referred to in the telephone interview, discloses the "prefetcher 16 determines if the predicted cache line is already present in the cache 14 or prefetch cache 18." The reference does not disclose providing a model of the data elements currently in the cache. The reference only discloses determining if a data element is in the cache, but does not disclose providing a representation of the data or related properties in the form of a model.
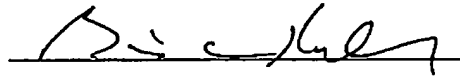
Col. 6, lines 26-37 of Weinberger, referred to in the Advisory Action, discloses using the "prefetcher 16 [using] the prefetch cache 18 as a victim cache" to store previous cache elements that have fallen out of the cache and are not currently in the cache.

Col. 5, lines 1-5 of Weinberger, referred to in the most recent Office Action, discloses a "prefetcher 16 [that] has access to previous cache misses only rather than the whole set of memory addresses" (emphasis added). The reference does not disclose providing a model of the data elements currently within the cache. Cache misses are, by definition, data elements that are not currently in the cache.

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None of the cited references discloses providing a model of the data elements currently stored within the cache. Furthermore, none of the cited references discloses making a cache management decision based on such a model. As a result, Applicant respectfully requests that the proposed amendments be accepted and that the present application be allowed.

Should additional information be required regarding the proposed amendment enumerated above, the Examiner is respectfully requested to notify Applicant of such required information. If any impediments to the prompt allowance of the claims can be resolved by an additional telephone conversation, the Examiner is respectfully requested to contact the undersigned.

Respectfully submitted,

Brian C. Kunzler
Reg. No. 38,527
Attorney for Applicants

Date: August 29, 2003
10 West 100 South
Suite 450
Salt Lake City, UT 84101
Telephone (801) 994-4646
Fax (801) 531-1929

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